

EXHIBIT I

CIN-TEL CORPORATION

PH: 513-621-7723

FX: 513-263-9023

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

THE WILLIAM POWELL COMPANY, :
Plaintiff, :
vs. : CASE NO.:
NATIONAL INDEMNITY COMPANY, et al., : 1:14-CV-00807
Defendants. :

TELEPHONIC DEPOSITION OF: PETER DINUNZIO
December 14, 2016
11:02 a.m.

REPORTED BY:

Renee Rogers, Registered Professional Reporter

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SOUTHERN DISTRICT OF OHIO
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THE WILLIAM POWELL COMPANY, :
Plaintiff, :
vs. : CASE NO.:
NATIONAL INDEMNITY COMPANY, et al., : 1:14-CV-00807
Defendants. :

Telephonic deposition of PETER DINUNZIO, a
witness herein, taken by the Plaintiff as upon
cross-examination pursuant to notice and stipulations
hereinafter set forth, at the offices of Vorys, Sater,
Seymour and Pease, LLP, 301 East Fourth Street, Suite
3500, Cincinnati, Ohio, at 11:02 a.m. on Wednesday,
December 14, 2016, before Renee Rogers, Registered
Professional Reporter and notary public within and for
the state of Ohio.

Cin-Tel Corporation
810 Sycamore Street, Suite 103
Cincinnati, Ohio 45202
(513) 621-7723

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STIPULATIONS

It is stipulated by and among counsel for the
respective parties that the telephonic deposition of
Peter Dinunzio may be taken at this time by the
Plaintiff as upon cross-examination pursuant to the
Federal Rules of Civil Procedure and pursuant to
Notice and agreement of counsel as to the time and
place; that the deposition may be taken in stenotype
by the notary public-court reporter and transcribed by
her out of the presence of the witness; that the
deposition is to be submitted to the deponent for his
examination and signature, and that the signature may
be affixed outside the presence of the notary
public-court reporter.

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APPEARANCES:
On behalf of the Plaintiff:
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EXHIBITS

(No exhibits were marked.)

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<p>1 MR. BRUNNER: We're on the record. 2 Can everyone on the line please identify 3 themselves for the record. This is Joe 4 Brunner at Vorys, Sater, Seymour and 5 Pease, representing William Powell 6 Company. 7 MR. GARNER: Rich Garner on behalf 8 of OneBeacon Insurance Company. 9 THE WITNESS: Peter Dinunzio. 10 MR. BRUNNER: Good morning, 11 Mr. Dinunzio. 12 THE WITNESS: Good morning. 13 MR. BRUNNER: Before we get into the 14 substance, I want to do a couple things 15 first. Tell us where you're sitting 16 right now. 17 THE WITNESS: Sure. I'm sitting in 18 my office. 19 MR. BRUNNER: And where is that? 20 THE WITNESS: That is in New York 21 City. 22 MR. BRUNNER: Okay. We are here in 23 Cincinnati. We're all participating by 24 phone. The court reporter is here with</p>	<p>1 answer. 2 I've got a little bit of a cold, so 3 if you don't understand what I'm saying, 4 please just let me know. If you do 5 understand -- if you do answer one of my 6 questions, I'm going to assume you 7 understood it. 8 Because we're all on the phone, we 9 need a verbal response, and that's 10 actual words, not uh-huh or huh-uh. Do 11 you understand? 12 THE WITNESS: I do. 13 MR. BRUNNER: Do you have any 14 documents in front of you right now? 15 THE WITNESS: Yes. 16 MR. BRUNNER: What documents? 17 THE WITNESS: My declaration. 18 MR. BRUNNER: Okay. I'm going to 19 ask you to please just put that aside. 20 I want to question you today based on 21 your memory, not based on your written 22 declaration. 23 THE WITNESS: Sure. 24 MR. BRUNNER: Thank you.</p>
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<p>1 me in Cincinnati. 2 She cannot administer an oath over 3 the phone without having a notary or 4 someone else physically present with 5 you, but we've discussed this with 6 Mr. Garner last week, and we've 7 stipulated that the testimony you are 8 about to offer will be considered under 9 oath. You're obligated to tell the 10 truth. 11 Rich, that stipulation is still in 12 place, correct? 13 MR. GARNER: It still holds true. 14 MR. BRUNNER: And, Mr. Dinunzio, you 15 understand? 16 THE WITNESS: I do. 17 MR. BRUNNER: Okay. Thank you. 18 Have you ever been deposed before? 19 THE WITNESS: Yes. 20 MR. BRUNNER: All right. Well, I'm 21 just going to do a couple quick 22 instructions. If any of my questions 23 are unclear, please tell me, and I'll 24 work with you to get a question you can</p>	<p>1 PETER DINUNZIO, 2 having acknowledged that his testimony will be 3 given as if under oath, was examined and testified 4 as follows: 5 CROSS-EXAMINATION 6 BY MR. BRUNNER: 7 Q What did you do to prepare for this 8 deposition? 9 A I spoke with my counsel. 10 Q Did you review any documents? 11 A Yes. 12 Q What documents? 13 A My declaration. 14 Q Thank you. Now, you executed a 15 declaration in this case, as we've alluded to. 16 Who drafted that declaration? 17 A I drafted that in conjunction with 18 my counsel. 19 Q Did you review it before you signed 20 it? 21 A I did. 22 Q Did you believe it was accurate when 23 you signed it? 24 A Yes.</p>

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<p style="text-align: right;">Page 10</p> <p>1 Q Thank you. What is your current job 2 position? 3 A Senior counsel with the law firm of 4 Clyde & Co. 5 Q Can you spell that name, please. 6 A Sure. C-L-Y-D-E, ampersand, C-O. 7 Q Thank you. 8 A You bet. 9 Q Where did you work before you were 10 at Clyde & Co.? 11 A Resolute Management, Inc. 12 Q What was your job at Resolute? 13 A Before I left? 14 Q Yes. Yes. 15 A I was an assistant vice president 16 with Resolute's Asbestos Strategic Unit. 17 Q How long were you employed at 18 Resolute? 19 A Approximately seven years. 20 Q And were you an assistant vice 21 president with the Asbestos Strategic Unit the 22 entire time? 23 A No. 24 Q What was your position -- what other</p>	<p style="text-align: right;">Page 12</p> <p>1 A Okay. 2 Q Do you understand? 3 A Yes. 4 Q Okay. And from your title -- your 5 current title of senior counsel, I'm assuming that 6 you're an attorney. 7 A Yes, that's correct. 8 Q Did you function as an attorney for 9 Resolute? 10 A I did not. 11 Q Okay. Thank you. So as an 12 assistant vice president with the -- strike that. 13 If I refer to the Asbestos Strategic 14 Unit as the ASU, will you understand what I'm 15 referring to? 16 A I will. 17 Q Okay. While you were with the ASU, 18 what did you have to do with the Powell account? 19 A On occasion I would approve certain 20 individual settlements, asbestos settlements. 21 Q And what occasion would cause you to 22 be involved? 23 A It would -- it would typically 24 depend upon the amount of the settlement under</p>
<p style="text-align: right;">Page 11</p> <p>1 positions did you have at Resolute? 2 A I was an assistant vice president 3 and team leader from roughly 2010 to 2013, and an 4 account manager from roughly 2008 to 2010. 5 Q I'm sorry. Can you give me the 6 years that you were with the Asbestos Strategic 7 Unit. 8 A Yes. Mid-2013 to 2015. 9 Q And then did you leave Resolute in 10 2015? 11 A Yes. 12 Q Okay. These three positions you had 13 at Resolute, in which ones did you have 14 involvement with the William Powell account? 15 A Only in the role with the Asbestos 16 Strategic Unit. 17 Q So only when you were an assistant 18 vice president with the Asbestos Strategic Unit 19 from 2013 to 2015? 20 A That's correct. 21 Q Okay. Unless I say otherwise, all 22 of my questions are going to be about that time 23 period from 2013 to 2015 when you were with the 24 Asbestos Strategic Unit.</p>	<p style="text-align: right;">Page 13</p> <p>1 consideration. 2 Q Were there other factors that would 3 lead you to be involved? You said typically. I'm 4 trying to figure out what else would -- what else 5 is encompassed by typically. 6 A Well, I suppose the other 7 circumstance, which would tend to go hand in hand 8 with settlement of a case, would be trial of a 9 case. 10 Q And that's trial regardless of the 11 amounts involved? 12 A That's correct. 13 Q Did you have any involvement with 14 the general supervision of Powell's account? 15 A No. 16 Q Did you have any involvement with 17 formulating or applying general Resolute policies 18 or procedures that would apply to the Powell 19 account? 20 A No. Not that I recall. 21 Q Okay. So when you're involved in 22 approving individual settlements or the trial of a 23 case, tell me what you did. 24 A Sure. Generally, I received an</p>

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<p>1 e-mail from Darilyn Michaud or Clayton Budlong 2 alerting me to a fact that they were considering 3 settlement of a particular case. 4 They would send me the information 5 about that case if they were seeking settlement -- 6 approval of a settlement that would require my 7 authority. Generally we would discuss the merits 8 of that case, and -- and it would approve the 9 settlement amount. 10 Q You said you would get an e-mail 11 from either Darilyn Michaud or Clayton Budlong. 12 Would it be either one of them? 13 A It would be one or the other, as I 14 recall. 15 Q And when you're discussing -- well, 16 let's go back a step. What kind of information 17 would they send you? 18 A They would -- they would send me 19 something called an asbestos request for 20 settlement authority and an e-mail describing the 21 particulars of the case. 22 Q And then what would you discuss with 23 them? 24 A Usually just the particulars of the</p>	<p>1 A It's my recollection. 2 Q One or the other, or both? 3 A Both. 4 Q What about other members of the ASU; 5 would you discuss claims with them, or would you 6 typically handle things on your own? 7 A Yeah. I mean, I guess on Powell I 8 don't recall whether -- really whether it was one 9 or the other or both from... 10 Q Are you finished? 11 A Yes. 12 Q So what kinds of written documents 13 did you see as part of your job with the ASU? And 14 we've already talked about e-mails and ARFSAs, 15 asbestos requests for settlement authority. What 16 else? 17 A The only other thing that comes to 18 mind is the settlement calculator. 19 Q What's that? 20 A An Excel spreadsheet. 21 Q And what is that spreadsheet used 22 for? 23 A Used as a tool to assist in the 24 evaluation of asbestos claim settlement.</p>
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<p>1 asbestos claim involved. 2 Q Would you discuss the particulars of 3 the claim with anyone else? 4 A That could happen sometimes, sure. 5 Q Who -- I'm sorry. With whom? 6 A If a case were proceeding to trial, 7 then that would need to be reported to my 8 supervisors. 9 Q And who were they? 10 A For a period of time, Brooke Green 11 and Tom Ryan; another period of time, Robert 12 McCarthy and Tom Ryan. 13 Q Would those -- well, would those 14 discussions be via e-mail? 15 A I guess technically they would be in 16 person or in a meeting. There certainly could 17 have been e-mails. It would depend, based on the 18 claim. 19 Q When you're discussing these cases 20 with Ms. Green or Mr. Ryan or Mr. McCarthy, would 21 Darilyn or Clayton be involved in those 22 discussions? 23 A Yes. 24 Q Always?</p>	<p>1 Q Who creates those calculators? 2 A With respect to the William Powell 3 account, Darilyn typically would. 4 Q Would you ever create them? 5 A On occasion. 6 Q And who do you discuss them with? 7 A On Powell, usually Darilyn and 8 Clayton. 9 Q Even ones you create yourself? 10 A Yeah. 11 Q Who else do you send them to? 12 A On Powell, I only ever recall 13 communicating with Darilyn and Clayton about that. 14 Q So you never discussed the 15 settlement range calculator with your supervisors? 16 A If there were a claim involving 17 settlement beyond my authority, or a trial, I 18 would. I just don't recall whether -- whether 19 that situation ever arose on the Powell account 20 during my tenure with the ASU. 21 Q It's possible it did, you just don't 22 recall? Is that fair? 23 A It is. 24 Q What kind of -- what about any kind</p>

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<p>1 of written memo?</p> <p>2 A No. I don't recall anything like</p> <p>3 that.</p> <p>4 Q Any kinds of internal policies or</p> <p>5 procedures?</p> <p>6 A No. Nothing like that.</p> <p>7 Q Did you ever keep or have a physical</p> <p>8 file concerning Powell?</p> <p>9 A I did not.</p> <p>10 Q Did you have access to any kind of</p> <p>11 shared network space concerning Powell?</p> <p>12 A I had access to shared network</p> <p>13 space. I don't recall if I ever saved anything</p> <p>14 Powell related on it, but if I did, it would be</p> <p>15 there.</p> <p>16 Q Did that shared network space have a</p> <p>17 name, or a title, or anything like that?</p> <p>18 A We called it the shared drive.</p> <p>19 Q What kinds of documents would</p> <p>20 typically be shared to -- or saved to that shared</p> <p>21 drive?</p> <p>22 A I mean, in the context of Powell,</p> <p>23 one might save an asbestos request for settlement</p> <p>24 authority or a settlement calculator.</p>	<p>1 you met with Darilyn or Clayton or Mr. Green -- or</p> <p>2 Ms. Green or Mr. Ryan; were there any kinds of</p> <p>3 written meeting agendas prepared beforehand?</p> <p>4 A I mean, the only thing I can think</p> <p>5 of is if there's, you know, an e-mail with a</p> <p>6 calendar appointment, maybe there's something in</p> <p>7 there.</p> <p>8 Q What about notes or a memo</p> <p>9 summarizing the meeting, or an e-mail summarizing</p> <p>10 the meeting?</p> <p>11 A Any follow-up communication like</p> <p>12 that including e-mail would have included Clayton</p> <p>13 and Darilyn.</p> <p>14 Q So Mr. Budlong stopped working as a</p> <p>15 team leader in 2014. Who else did you communicate</p> <p>16 with?</p> <p>17 A I recall communicating with Clayton</p> <p>18 and Darilyn. I think maybe Mr. Gaines became her</p> <p>19 team leader after that. I don't recall whether I</p> <p>20 had any Powell-related communications really after</p> <p>21 late 2014. That's probably why I'm referring to</p> <p>22 Clayton. But I may have had communications with</p> <p>23 Greg.</p> <p>24 Q What about with Kevin Hannemann?</p>
Page 19	Page 21
<p>1 Q These settlement calculators, were</p> <p>2 they created for every claim?</p> <p>3 A I don't believe they were required</p> <p>4 for every claim. I think it depended on the level</p> <p>5 of the settlement involved.</p> <p>6 Q Do you remember what that level was?</p> <p>7 A I don't exactly. It was some --</p> <p>8 above some thousands of dollars, is my</p> <p>9 recollection.</p> <p>10 Q Do you recall how frequently you</p> <p>11 either saw or created one of these settlement</p> <p>12 calculators? I mean, was it twice a week? once a</p> <p>13 month? 10 times a week? Can you give me an</p> <p>14 estimate?</p> <p>15 A I'm sorry. I can't. I couldn't</p> <p>16 really approximate it.</p> <p>17 Q So we talked about e-mails. What</p> <p>18 other kinds of written communications did you have</p> <p>19 concerning Powell?</p> <p>20 A The e-mails were it in terms of</p> <p>21 written communications.</p> <p>22 Q So no written notes or letters?</p> <p>23 A No.</p> <p>24 Q What about meeting agendas for when</p>	<p>1 A No.</p> <p>2 Q What about with David Warren?</p> <p>3 A I certainly communicated with David</p> <p>4 Warren. He worked with me in the Asbestos</p> <p>5 Strategic Unit. I don't recall whether we had any</p> <p>6 communications related to Powell.</p> <p>7 Q Was Mr. Hannemann also in the ASU?</p> <p>8 A Not during my time at Resolute.</p> <p>9 Q Who else was during your time at</p> <p>10 Resolute?</p> <p>11 A David Warren and Adrian Van.</p> <p>12 Q So can you explain how -- a little</p> <p>13 bit more about how the ASU worked. So there's an</p> <p>14 underlying asbestos claim that either involves a</p> <p>15 settlement request that exceeds Darilyn's</p> <p>16 authority or that involves a trial. Would they</p> <p>17 always go to you, or would they sometimes go to</p> <p>18 other members of the ASU?</p> <p>19 A They could go to other members of</p> <p>20 the ASU, depending on the amount of authority</p> <p>21 involved.</p> <p>22 Q So different members of the ASU got</p> <p>23 involved at different levels of authority</p> <p>24 requested? Is that fair?</p>

6 (Pages 18 to 21)

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<p>1 A At different -- and at different</p> <p>2 points in time.</p> <p>3 Q Okay. Was there any other basis</p> <p>4 determining who got involved from the ASU?</p> <p>5 A I guess I'm -- I guess I'm</p> <p>6 struggling a little with kind of what you mean by</p> <p>7 basis for getting involved. I mean, it was not</p> <p>8 uncommon, you know, for me to consult with</p> <p>9 Mr. Warren about a particular claim. You know,</p> <p>10 that certainly happened with some frequency.</p> <p>11 I don't know that we had sort of a</p> <p>12 bright-line rule for that beyond sort of the</p> <p>13 question of -- or beyond the different levels of</p> <p>14 settlement authority or amounts involved.</p> <p>15 Q So where did you fall in the line of</p> <p>16 settlement authority? Relative to the other</p> <p>17 members of the ASU, did you have more settlement</p> <p>18 authority?</p> <p>19 A Yeah.</p> <p>20 Q Did you have the most settlement</p> <p>21 authority when you were with the ASU?</p> <p>22 A In terms of among members of the</p> <p>23 ASU?</p> <p>24 Q Yes.</p>	<p>1 many communications about Powell after -- what</p> <p>2 date was that again?</p> <p>3 A Late 2014 or early 2015, sometime</p> <p>4 around there.</p> <p>5 Q When exactly did you leave Resolute</p> <p>6 in 2015?</p> <p>7 A The end of May.</p> <p>8 Q Who took over your responsibilities,</p> <p>9 if you know?</p> <p>10 A David Warren.</p> <p>11 Q Do you know who took over</p> <p>12 Mr. Warren's responsibilities?</p> <p>13 A I don't.</p> <p>14 Q Who did you talk to or speak with</p> <p>15 about Powell in terms of oral communications,</p> <p>16 phone, individual face to face?</p> <p>17 I know you've testified to a couple</p> <p>18 individuals and stuff already, but is there anyone</p> <p>19 else beyond who you've already mentioned?</p> <p>20 A No. Not that I recall.</p> <p>21 Q Were there ever any written records</p> <p>22 or notes made concerning those conversations?</p> <p>23 A There -- I mean, there may be</p> <p>24 e-mails. Darilyn and Clayton would I think</p>
Page 23	Page 25
<p>1 A Yes.</p> <p>2 Q Did Mr. Warren or Ms. Van have more</p> <p>3 authority than each other?</p> <p>4 A Mr. -- Mr. Van did not have</p> <p>5 authority.</p> <p>6 Q I'm sorry. I said Ms. I didn't</p> <p>7 know it's Mr.</p> <p>8 A Yeah. He did not have authority.</p> <p>9 Mr. Warren had authority.</p> <p>10 Q Did you have any communications with</p> <p>11 Chris Dardis about Powell?</p> <p>12 A Not that I recall.</p> <p>13 Q What about with Lisa Lipman?</p> <p>14 A Not that I recall.</p> <p>15 Q Did you ever communicate with anyone</p> <p>16 at OneBeacon about Powell and the Powell account?</p> <p>17 A No. I don't recall ever having</p> <p>18 communications like that.</p> <p>19 Q What about people at NICO?</p> <p>20 A No. No. I don't recall that</p> <p>21 either.</p> <p>22 Q Now, all the communications that</p> <p>23 you're talking about occurred while you were with</p> <p>24 the ASU. And I believe you said you don't recall</p>	<p>1 certainly trade e-mails about meetings at times.</p> <p>2 Q But you never actually wrote any</p> <p>3 yourself?</p> <p>4 A I don't know if that's correct.</p> <p>5 Q Do you remember for sure?</p> <p>6 A I don't.</p> <p>7 Q So you testified earlier that</p> <p>8 Darilyn or Clayton would be involved in all your</p> <p>9 communications that you had about the individual</p> <p>10 claims, and even the ones that you had with your</p> <p>11 supervisors; is that right?</p> <p>12 A They -- they -- yeah. Although --</p> <p>13 although, to be clear, I don't -- sorry. Can you</p> <p>14 repeat that question.</p> <p>15 Q It was probably a bad question. The</p> <p>16 court reporter is going to read back the question.</p> <p>17 A Great.</p> <p>18 THE COURT REPORTER: Question: So</p> <p>19 you testified earlier that Darilyn or</p> <p>20 Clayton would be involved in all your</p> <p>21 communications that you had about the</p> <p>22 individual claims, and even the ones</p> <p>23 that you had with your supervisors; is</p> <p>24 that right?</p>

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<p>1 Q Is that any clearer?</p> <p>2 A I mean -- I mean, yeah, that's fair,</p> <p>3 to the best of my recollection. I guess my -- you</p> <p>4 know, with respect to individual claims, if we're</p> <p>5 talking about settlement, I guess I don't -- I</p> <p>6 don't recall any individual Powell settlements</p> <p>7 that went beyond my own authority, beyond, you</p> <p>8 know, Darilyn's or her team leader's or my own</p> <p>9 authority.</p> <p>10 I think there was one Powell trial</p> <p>11 that was discussed with my supervisors, and</p> <p>12 Darilyn and Clayton were certainly involved in</p> <p>13 those discussions. But that's just sort of I</p> <p>14 suppose what I wanted to clarify.</p> <p>15 Q Do you remember what trial that was?</p> <p>16 A It was called the Hilliard case.</p> <p>17 Q So did you ever have communications</p> <p>18 with your supervisors about the Powell account</p> <p>19 generally, not tied to any one specific individual</p> <p>20 asbestos claim?</p> <p>21 A No. Not that I recall.</p> <p>22 Q So what did you do to confirm your</p> <p>23 belief that all these communications would have</p> <p>24 included Ms. Michaud or Mr. Budlong?</p>	<p>1 ever search your e-mail account, computer, or</p> <p>2 shared network spaces for documents relating to</p> <p>3 Powell?</p> <p>4 A No. I don't recall doing that.</p> <p>5 Q To your knowledge, did anyone else</p> <p>6 ever do that?</p> <p>7 A Not that I'm aware.</p> <p>8 Q While you were with Resolute, were</p> <p>9 you ever instructed to preserve documents relating</p> <p>10 to Powell?</p> <p>11 A I don't know.</p> <p>12 Q Were you ever instructed to stop any</p> <p>13 deletion of e-mails or other documents relating to</p> <p>14 Powell?</p> <p>15 A I don't know.</p> <p>16 Q Just give me one second,</p> <p>17 Mr. Dinunzio.</p> <p>18 A Sure.</p> <p>19 MR. BRUNNER: Okay. Mr. Dinunzio,</p> <p>20 that's all we have for you today.</p> <p>21 Rich, do you have anything you want</p> <p>22 to ask him?</p> <p>23 MR. GARNER: No. We will reserve</p> <p>24 the right to read it, if it's ordered.</p>
Page 27	Page 29
<p>1 A I searched my own memory.</p> <p>2 Q And I understand that you're not at</p> <p>3 Resolute anymore, but you didn't look at any of</p> <p>4 your old e-mails?</p> <p>5 A I did not.</p> <p>6 Q None of them were provided for you</p> <p>7 to look at?</p> <p>8 A They were not.</p> <p>9 Q Did anyone ever tell you that they</p> <p>10 had done a search of all your old e-mails?</p> <p>11 A No.</p> <p>12 Q Now, do you have any knowledge over</p> <p>13 how long Ms. Michaud kept e-mails in her Outlook</p> <p>14 account, or documents?</p> <p>15 A I do not.</p> <p>16 Q When did you first learn of this</p> <p>17 litigation?</p> <p>18 A I have no idea.</p> <p>19 Q Was it while you were at Resolute?</p> <p>20 A I don't know.</p> <p>21 Q Have you ever seen Powell's</p> <p>22 discovery requests in this matter?</p> <p>23 A I have not.</p> <p>24 Q While you were at Resolute, did you</p>	<p>1 We reserve signature. Other than that,</p> <p>2 Peter, thank you very much. I will be</p> <p>3 in touch.</p> <p>4 THE WITNESS: Thank you.</p> <p>5 (Deposition concluded at 11:38 a.m.)</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>

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ACKNOWLEDGEMENT

STATE OF OHIO :
COUNTY OF HAMILTON :

I, Peter Dinunzio, have read the transcript of
my testimony, given as if under oath, on December
14, 2016.

Having had the opportunity to note any
necessary corrections of my testimony on the
errata page, I hereby certify that the
above-mentioned transcript is a true and complete
record of my testimony.

PETER DINUNZIO

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CERTIFICATE

I, Renee Rogers, a notary public within
and for the State of Ohio, do hereby certify that
the within 30 pages were taken by me in stenotypy
and transcribed by computer-aided transcription,
and that this is a true, accurate, and complete
transcription of the same.

My commission expires: Renee Rogers
April 13, 2021 Notary Public-State of Ohio

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